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REMARKS

I. Status of the Application.

Claims 1-32 of the Application were pending as of the date of the Office Action. In the Office Action, the Examiner:

- (a) Noted that when the patent number of the parent case is known, it must be added;
- (b) Requested that the Applicants amend line 5 of the Abstract to add "which may include partial spheres" after the word "features";
- (c) Rejected claims 1-2, 4-11, 14-17, 24-27 and 29-31 under 35 U.S.C. §102(b) as being, allegedly, anticipated by U.S. Patent No. 5,558,543 to Takano ("Takano '543") or U.S. Patent No. 5,082,452 to Takano et al. ("Takano '452");
- (d) Rejected claims 1-2, 4-11, 14-17, 24-27 and 29-31 under 35 U.S.C. §103(a) as being, allegedly, obvious over Takano '543 alone or in view of Takano '452;
- (e) Rejected claims 12, 13, 18-23 and 32 under 35 U.S.C. §103(a) as being, allegedly, obvious over U.S. Patent No. 6,467,942 to Alloway et al. ("Alloway") in view of Takano '543, Takano '452 and U.S. Patent No. 5,795,170 to Okabe ("Okabe"); and
- (f) Rejected claims 1-3, 14, 27 and 28 under 35 U.S.C. §103(a) as being, allegedly, obvious over U.S. Patent No. 6,666,689 to Savage ("Savage") in view of U.S. Patent No. 4,966,557 to Barkus et al. ("Barkus").

In this response, Applicants amend the abstract as requested, amend claims 1, 11, 14, 17-19, 28, 29, and 30, cancel claims 8, 9, 16, 22, and 23, and add claims 33-39. Applicants respectfully submit that the foregoing amendments and following remarks incorporated herein overcome the Examiner's rejections of and objections to the Application.

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II. Applicants' Amendments Do Not Constitute New Matter.

Applicants respectfully submit that the amendments to the claims and to the Abstract do not add new matter to the Application. Claims 1, 14 and 29 have been amended to incorporate some of the limitations of claims 8-9, 16, and 22-23, respectively and is supported, among other places, at page 13, lines 3-16. Claims 17 and 30 have been amended so that the language of each of the claims properly refer back to the amended limitations of claims 14 and 29, respectively. Claim 18 has been amended to properly use the antecedent "a" when referring to the claimed lead end, because the lead end limitation was stricken from independent claim 14. Claim 28 has been amended to properly depend from claim 14. New claims 33-39 have been added, which are fully supported by the Application as filed. Applicants have also complied with the Examiner's request to amend the Abstract to clarify that the alignment features may include partial spheres. Each of these amendments are supported by the originally filed Application and do not constitute new matter. Accordingly, Applicants respectfully request entry of these amendments.

III. Applicants Will Provide The Patent Number Of The Parent Application As Soon As It Is Known.

The parent application has received a notice of allowance but has yet to be assigned a patent number. As soon as Applicants are made aware of the patent number, they will add it to this Application.

IV. The Objection To The Abstract Should Be Withdrawn.

As requested by the Examiner, the Applicants have amended the fifth line of the Abstract to clarify that the alignment features "may include partial spheres". Accordingly, Applicants respectfully submit that the objection to the Abstract should be withdrawn.

V. Claim Rejections – 35 U.S.C. §102(b)

Claims 1-2, 4-11, 14-17, 24-27 and 29-31 were rejected under 35 U.S.C. § 102(b) as being anticipated by Takano '543 or Takano '452 (collectively "the Takano references"). For at least the following reasons, Applicants respectfully traverse the rejection.

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A rejection under §102(b) can be overcome by showing that the prior art does not disclose all the limitations of the claims. MPEP §706.02(b). Regarding independent claims 1, 14 and 29, as amended, nowhere do the Takano references disclose a terminal comprising "a first terminal surface of the blade and a second terminal surface of the blade that are opposed from each other and connected to and integral with a base that is perpendicular to the first and second terminal surfaces" *and* "a side wall that is integral with, and connects, the first terminal surface to the second terminal surface," as recited in the subject claims. Instead, Takano '543 discloses a connector 7 that includes a pair of U-shaped clamps 5, an eyeglass shaped connection piece 6 and two protruding ribs 7a placed on each clamp 5. (Fig. 1, Col. 3, ll. 40-63). Although different reference numbers are used, Takano '452 also discloses a connector 2 with a pair of U-shaped clamps 22, an eyeglass shaped connection piece 23 and two protruding ribs 28 placed on each clamp 22. (Figs. 1, 4-11, 15-17, 20-26, 28, 34, 38-44, 46, 52, 55-63, and 65; Col. 2, ll. 58-66; and Col. 3, ll. 27-34). In the Takano references, the connector and U-shaped clamps 22 are connected to one another through a base only. (See Fig. 1 of Takano '543 and Figs. 1, 4-11, 15-17, 20-26, 28, 34, 38-44, 46, 52, 55-63, and 65 of Takano '452). Furthermore, while the connector 7 in Takano '543 may resemble a sidewall, connector 7 is neither integral with nor connects the first terminal surface to the second terminal surface.

In addition to the above-noted deficiencies, the Takano references also fail to disclose a terminal comprising "at least *three* alignment features . . . each located on a portion of the first and the second terminal surfaces . . . in close proximity to the side wall," as also recited in claims 1, 14 and 29. (emphasis added). Rather, only *two* of the four proposed alignment features (protruding ribs 7a) in the Takano references are located in close proximity to any side of the terminal and, therefore, only two proposed alignment features 7a would be located in close proximity to any side wall. The other two protruding ribs 7a would still be susceptible to deformation and would lead to deformation of the terminal itself. Such deformation causes the terminal to be unstable in the socket and may lead to a faulty bulb-

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terminal connection. The claimed invention generally solves this problem by providing a terminal with all the "alignment features . . . positioned relative to one another on the first and second terminal surfaces to stabilize the at least one terminal" and "positioned ... in close proximity to the side wall." (Amended claims 1, 14, and 29).

The claims that depend from claims 1, 14 and 29 include additional patentably distinct limitations and, therefore, are patentably distinct as well. For example, nowhere do the Takano references disclose at least two alignment features that are located on the first terminal surface (in close proximity to a side wall), as recited in claims 4 and 24, or at least two alignment features that are located on the second terminal surface (in close proximity to a side wall), as recited in claims 5 and 25.

For at least the above reasons, the claim rejections with respect to claims 1-2, 4-11, 14-17, 24-27 and 29-31 are unsupported by the art and should be withdrawn.

V. Claim Rejections – 35 U.S.C. §103(a)

A. Claims 1-2, 4-11, 14-17, 24-27 and 29-31 were rejected under 35 U.S.C. §103(a) as being obvious over Takano '543 alone or in view of Takano '452. For at least the following reasons, Applicants respectfully traverse the rejection.

To establish a *prima facie* case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all the claim limitations. The teaching or suggestion to make the claimed combination and the reasonable expectation of success must both be found in the prior art, not in the applicant's disclosure. *In re Vaack*, 947 F.2d 488, 20 USPQ2d 1438 (Fed. Cir. 1991) (Emphasis added). See MPEP 2143.

In the present case, for at least the reasons set forth above with respect to the rejection of claims

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1-2, 4-11, 14-17, 24-27 and 29-31 under §102(b), the Takano references, taken singly or in combination, fail to teach or suggest each of the claim limitations recited in the subject claims and, therefore, a *prima facie* case of obviousness has not been established.

B. Claims 12, 13, 18-23 and 32 were rejected under 35 U.S.C. §103(a) as being obvious over Alloway in view of Takano '543, Takano '452 and Okabe. For at least the following reasons, Applicants respectfully traverse the rejection.

As a preliminary matter, Applicants submit that claims 22 and 23 have been cancelled rendering the rejection moot with respect to those claims. Regarding claims 12, 13, 18-21 and 32, Alloway, either alone or in combination with Takano '543, Takano '452 and Okabe, fails to disclose, teach or suggest "a terminal comprising at least three alignment features . . . extending outward from the first and second terminal surfaces," or "a side wall that is integral with and connects the first terminal surface to the second terminal surface," as recited in the claims. Indeed, the Alloway terminal design is devoid of any alignment features or a side wall that is integral with and connects the first terminal surface to the second terminal surface. (Figs. 1-3 and Col. 3, ll. 29-45). For at least the reasons noted above with respect to the §102(b) rejection, the Takano references fail to make up for the deficiencies of Alloway. Similarly, Okabe fails to make up for the deficiencies of Alloway and the Takano references since Okabe discloses a waterproof connector 1 that comprises a female terminal 3 positioned within the connector housing 2 without the use of any alignment features. (Figs. 1-3 and Col. 3, ll. 3-9). Accordingly, the Office Action fails to make out a *prima facie* case of obviousness with respect to claims 12, 13, 18-23 and 32 and the 103(a) rejection should be withdrawn.

C. Claims 1-3, 14, 27 and 28 were rejected under 35 U.S.C. §103(a) as being obvious over Savage in view of Barkus. For at least the following reasons, Applicants respectfully traverse the rejection.

Regarding claims 1-3, 14, 27, and 28, the Savage and Barkus references, taken alone or in

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combination, fail to disclose, teach or suggest "a first terminal surface of the blade and a second terminal surface of the blade that are opposed from each other," "a base that is perpendicular to first and second terminal surfaces" or "a side wall that connects the first and second terminal surfaces . . . the sidewall being perpendicular to a base," as recited in amended claims 1 and 14. Instead, Savage discloses a generally square terminal (see, e.g., Fig. 6) having four walls that are parallel to each other. While the proposed terminal surfaces in Savage may be opposed from each other, neither of the four walls in the Savage terminal are perpendicular to the proposed terminal surfaces.

Similarly, the Barkus contact element 10 fails to make up for the deficiencies of Savage. Additionally, the Office Action mischaracterizes the prongs 24 and lances 42 in the Barkus contact element as alignment features. Barkus neither teaches nor suggests that the lances 42 are alignment features. Instead, Barkus teaches that teeth 60 may be provided in lieu of a lance 42 to provide resistance to withdrawal from a cavity and, therefore, their only capacity is to resist, not align. (Barkus Col. 2, ll. 63-69). Similarly, the resilient web 34 floats the socket 18 (which includes the prong 24) into proper alignment with respect to rib 55 and entrance 68. (Barkus Col. 3, ll. 10-14). Thus, the resilient web 34, not prong 24, urges proper alignment of the terminal. Even if these features in Barkus are still considered alignment features, which they are not, they are still not located on first and second terminal surfaces in close proximity to a side wall.

Accordingly, the Office Action fails to make out a *prima facie* case of obviousness with respect to claims 1 and 14 and the §103(a) rejection should be withdrawn. For at least the same reasons, Applicants respectfully submit that the rejection pertaining to claims 2 (depending from claim 1) and claims 27-28 (depending from claim 14) should be withdrawn, as they incorporate each of the limitations of their respective base claim.

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VI. New Claims 33-45 are Allowable Over the Prior Art

Applicants respectfully submit that new claims 33-39 include a combination of features that are neither disclosed, taught nor suggested in the cited references and, therefore, are allowable.

VII. Applicants Petition for An Extension of Time of Two (2) Months and Payment for Additional Claims.

Applicants hereby petition for an extension of time of two (2) months, under 37 C.F.R. §1.136(a), thereby extending the deadline for response to Monday, June 27, 2005. Applicants request that the \$950.00 payment for this extension of time, and the fees for new claims 33-39 be charged to Applicant's Deposit Account Number as indicated below.

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CONCLUSION

For all of the foregoing reasons, it is respectfully submitted that claims 1-39 are allowable claims. Allowance of this Application is therefore respectfully requested. In the event Applicants have inadvertently overlooked the need for payment of any fees, Applicants conditionally petition therefore, and authorize any deficiency to be charged to deposit account 09-0007. When doing so, please reference the above-listed docket number.

Respectfully submitted,

ICE MILLER



Alexander D. Forman, 51,691

ICE MILLER

One American Square, Box 82001

Indianapolis, IN 46282-0200

Telephone: (317) 236-5826 Facsimile:

(317) 592-5433

Date: 6/27/05

Enclosure: Fax Transmittal Sheet

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